

1 CHRISTINE CHANG PRO PER

2 Name and Address

3 341 TIDEWATER DRIVE # 214

4 ALAMEDA, CA 94501

FILED

09 MAR 24 PM 3:44

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

5 **UNITED STATES DISTRICT COURT**  
6 **NORTHERN DISTRICT OF CALIFORNIA**

7

8 CHRISTINE CHANG, ERIC SUN

9 Plaintiff / Petitioner

10 VS.

11 ROCKRIDGE MANOR

12 Defendant / Respondent

13 MANAGER et al.

14 Case No. C 07-4005 EMC

15 Document Name:

16 FIRST AMENDED

17 COMPLAINT

18 EXHIBIT A, B, C

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22

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26

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28

## EXHIBIT A

1 BRETT S. ALLEN, (SBN 165097)  
2 LAW OFFICE OF BRETT S. ALLEN  
3 909 Marina Village Parkway, #669  
4 Alameda, CA 94501  
5 Tel: (510) 872-9933

6  
7  
8 Attorney for Plaintiffs  
9 Christine Chang and  
10 Eric Sun

ENDORSED  
FILED  
ALAMEDA COUNTY  
SEP 1 2 2001

CLERK OF THE SUPERIOR COURT  
By R.C. Hughes,

8 SUPERIOR COURT OF CALIFORNIA  
9  
10 COUNTY OF ALAMEDA  
11  
12 UNLIMITED JURISDICTION

12 CHRISTINE CHANG and ERIC SUN

13 Plaintiffs,  
14  
15 CASE NO. 2001-023364  
16  
17 EVA AMMANN, ~~ELIZABETH LEADY~~,  
18 CHARLES BLAKENEY, MIKE  
19 SOLOMON, MURRAY SINGER, and  
20 DOES 1-100, inclusive  
21  
22 Defendants.

23  
24 COMPLAINT FOR INTENTIONAL  
25 INFILCTION OF EMOTIONAL  
DISTRESS, NEGLIGENCE, SLANDER,  
AND INTRUSION

26  
27 Plaintiffs, CHRISTINE CHANG and ERIC SUN complain of Defendants and each  
28 of them as follows:

29  
30 GENERAL ALLEGATIONS

31 1. At all times relevant to this lawsuit, Plaintiffs, CHRISTINE CHANG and  
32 ERIC SUN, ("Plaintiffs") were residents of Alameda County, California.  
33  
34 2. Plaintiffs are informed and believe that at all times relevant to this lawsuit  
35 defendant EVA AMMANN was and is a natural person residing in Alameda  
36 County.  
37  
38 3. Plaintiffs are informed and believe that at all times relevant to this lawsuit

1 defendant CHARLES BLAKENEY was and is a natural person residing in  
2 Alameda County.

3 4. Plaintiffs are informed and believe that at all times relevant to this lawsuit  
4 defendant MIKE SOLOMON was and is a natural person residing in Alameda  
5 County.

6 5. Plaintiffs are informed and believe that at all times relevant to this lawsuit  
7 defendant MURRAY SINGER was and is a natural person residing in Alameda  
8 County.

9 6. Defendants Does 1 through 100, inclusive, are sued herein under fictitious  
10 names because their true names and capacities, whether individual, associate,  
11 corporate or governmental, are not now known to Plaintiffs. Plaintiffs are  
12 informed and believe and upon such information and belief allege that each of  
13 the Defendants named as a Doe is negligently or otherwise legally responsible in  
14 some manner for the events herein alleged, and that said Defendants negligently  
15 acted or omitted to act in one or more of their occupations and businesses and  
16 that such negligence or fault proximately caused the injuries and damages  
17 hereinafter set forth. Plaintiffs pray leave to insert the true names and capacities  
18 of said Defendants when the same are ascertained.

19 7. At all times herein mentioned, each and every one of the Defendants  
20 herein was the agent, servant and employee of each other, and each was acting  
21 within the course and scope of such agency, service and employment.

22 8. At all times relevant to this lawsuit plaintiffs CHRISTINE CHANG and  
23 ERIC SUN resided in unit number 314 located in the Rockridge Manor  
24 Condominium complex at 2005 Pleasant Valley Avenue, Oakland, California.

25 9. At all times relevant to this lawsuit, plaintiffs are informed and believe that  
26 defendant EVA AMMANN was the manager of Rockridge Manor Condominium  
27 complex and resided in said complex located at 2005 Pleasant Valley Avenue,  
28 Oakland, California.

1 10. At all times relevant to this lawsuit, plaintiffs are informed and believe that  
2 defendant CHARLES BLAKENEY was on the board of directors of the Rockridge  
3 Manor Condominium complex and resided in said complex located at 2005  
4 Pleasant Valley Avenue, Oakland, California.

5 11. At all times relevant to this lawsuit, plaintiffs are informed and believe that  
6 defendant MIKE SOLOMON was on the board of directors of the Rockridge  
7 Manor Condominium complex and resided in the complex located at 2005  
8 Pleasant Valley Avenue, Oakland, California.

9 12. At all times relevant to this lawsuit, plaintiffs are informed and believe that  
10 defendant MURRAY SINGER was on the board of directors of the Rockridge  
11 Manor Condominium complex and resided in said complex located at 2005  
12 Pleasant Valley Avenue, Oakland, California.

13 **FIRST CAUSE OF ACTION**  
14 (Intentional Infliction of Emotional Distress)

15 13. On or about September 14, 2000, defendant EVA AMMANN contacted  
16 the Department of Social Services and knowingly and falsely reported that  
17 plaintiff ERIC SUN was acting dangerously and possessed a gun.

18 14. Defendants' conduct as alleged here was intentional and malicious and  
19 done for the purpose of causing Plaintiffs to suffer humiliation, mental anguish,  
20 and emotional and physical distress. Defendants CHARLES BLAKENEY, MIKE  
21 SOLOMON, and MURRAY SINGER's conduct in confirming and ratifying the  
22 wrongful conduct was done with a wanton and reckless disregard of the  
23 consequences to Plaintiffs.

24 15. As the proximate result of the aforementioned acts, Plaintiffs suffered  
25 humiliation, mental anguish, embarrassment, shame, and emotional and physical  
26 distress, and have been injured in mind and body, all to Plaintiffs's damage.

27 16. As a result of Defendants's conduct as alleged herein, Plaintiffs suffered  
28 severe emotional distress according to proof at trial including but not limited to

### **THIRD CAUSE OF ACTION (Slander against EVA AMMANN)**

22. Plaintiffs incorporate herein by reference each and every allegation as set forth in Paragraphs 1 through 21 above.

23. On or about September 14, 2000, defendant EVA AMMANN contacted the Department of Social Services and knowingly and falsely reported that plaintiff ERIC SUN was acting dangerously and possessed a gun.

24. Defendant EVA AMMANN's statements were made with wanton disregard for the truth and accused Plaintiff ERIC SUN of possessing a firearm. Therefore, Plaintiff ERIC SUN is entitled to and demands punitive damages against Defendant EVA AMMANN.

25. The result of Defendants's slander as alleged herein, caused Plaintiff ERIC SUN loss of security, humiliation, frustration, mental anguish, and emotional and physical distress.

## **FOURTH CAUSE OF ACTION (Intrusion)**

26. Plaintiffs incorporate herein by reference each and every allegation as set forth in Paragraphs 1 through 28 above.

27. Defendants actions caused the Department of Social Services and the police to intrude into the life of Plaintiff ERIC SUN in a highly offensive manner.

28. Defendants knew that falsely informing the Department of Social Services and/or the police would cause the police and Department of Social Services personnel to intrude into Plaintiff ERIC SUN's privacy by entering his condominium.

WHEREFORE, Plaintiffs pray judgment as hereinafter set forth.

## **ON THE FIRST AND THIRD AND FOURTH CAUSES OF ACTION:**

1. For general damages according to proof at the time of trial;
2. For costs of suit herein incurred;

3. For punitive damages; and
4. For such other and further relief as the Court deems just and proper.

## **ON THE SECOND CAUSE OF ACTION:**

1. For general damages according to proof at the time of trial;
2. For costs of suit herein incurred; and
3. For such other and further relief as the Court deems just and proper.

Dated: September 11, 2001

Law Office of Brett S. Allen

Brett S. Allen  
Attorney for Plaintiffs  
CHRISTINE CHANG and  
ERIC SUN

exhibit B

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5 Attorney for Plaintiffs  
Christine Chang and  
Eric Sun

6

7

8 SUPERIOR COURT OF CALIFORNIA

9 COUNTY OF ALAMEDA

10 UNLIMITED JURISDICTION

11

12 CHRISTINE CHANG and ERIC SUN

CASE NO.: 2001-023364

13 Plaintiffs,

14 vs.

15 EVA AMMANN, CHARLES BLAKENEY,  
MIKE SOLOMON, MURRAY SINGER,  
16 ROCKRIDGE MANOR HOA and DOES  
2-100, inclusive

FIRST AMENDED COMPLAINT FOR  
INTENTIONAL INFILCTION OF  
EMOTIONAL DISTRESS,  
NEGLIGENCE, SLANDER, AND  
INTRUSION

17 Defendants.

18  
19 Plaintiffs, CHRISTINE CHANG and ERIC SUN complain of Defendants and each  
20 of them as follows:

21 **GENERAL ALLEGATIONS**

22 1. At all times relevant to this lawsuit, Plaintiffs, CHRISTINE CHANG and  
ERIC SUN, ("Plaintiffs") were residents of Alameda County, California.

23 2. Plaintiffs are informed and believe that at all times relevant to this lawsuit  
defendant EVA AMMANN was and is a natural person residing in Alameda  
24 County.

25 3. Plaintiffs are informed and believe that at all times relevant to this lawsuit

1 defendant CHARLES BLAKENEY was and is a natural person residing in  
2 Alameda County.

3 4. Plaintiffs are informed and believe that at all times relevant to this lawsuit  
4 defendant MIKE SOLOMON was and is a natural person residing in Alameda  
5 County.

6 5. Plaintiffs are informed and believe that at all times relevant to this lawsuit  
7 defendant MURRAY SINGER was and is a natural person residing in Alameda  
8 County.

9 6. Upon filing the original cross-complaint herein, Plaintiffs were ignorant of  
10 the true names of each Defendant and having designated this Defendant in the  
11 complaint by a fictitious name, to-wit DOE-1, and having discovered the true  
12 name of the Defendant to be the Defendant described in this paragraph, Plaintiff  
13 hereby amends its complaint by inserting such true name in the place and stead  
14 of such fictitious name wherever it appears in the complaint. ROCKRIDGE  
15 MANOR HOA is a business entity, form unknown, which performed managerial  
16 functions at the Rockridge Manor Condominium Complex at the time of the  
17 relevant events described herein. Plaintiffs are informed and believe and thereon  
18 allege that the ROCKRIDGE MANOR HOA participated in the wrongful acts and  
19 omissions alleged herein and ratified the wrongful acts and omissions of the  
20 other defendants as alleged herein.

21 7. Defendants Does 2 through 100, inclusive, are sued herein under fictitious  
22 names because their true names and capacities, whether individual, associate,  
23 corporate or governmental, are not now known to Plaintiffs. Plaintiffs are  
24 informed and believe and upon such information and belief allege that each of  
25 the Defendants named as a Doe is negligently or otherwise legally responsible in  
26 some manner for the events herein alleged, and that said Defendants negligently  
27 acted or omitted to act in one or more of their occupations and businesses and  
28 that such negligence or fault proximately caused the injuries and damages

1 hereinafter set forth. Plaintiffs pray leave to insert the true names and capacities  
2 of said Defendants when the same are ascertained.

3 8. At all times herein mentioned, each and every one of the Defendants  
4 herein was the agent, servant and employee of each other, and each was acting  
5 within the course and scope of such agency, service and employment.

6 9. At all times relevant to this lawsuit plaintiffs CHRISTINE CHANG and  
7 ERIC SUN resided in unit number 314 located in the Rockridge Manor  
8 Condominium complex at 2005 Pleasant Valley Avenue, Oakland, California.

9 10. At all times relevant to this lawsuit, plaintiffs are informed and believe that  
10 defendant EVA AMMANN was the manager of Rockridge Manor Condominium  
11 complex and resided in said complex located at 2005 Pleasant Valley Avenue,  
12 Oakland, California.

13 11. At all times relevant to this lawsuit, plaintiffs are informed and believe that  
14 defendant CHARLES BLAKENEY was on the board of directors of the Rockridge  
15 Manor Condominium complex and resided in said complex located at 2005  
16 Pleasant Valley Avenue, Oakland, California.

17 12. At all times relevant to this lawsuit, plaintiffs are informed and believe that  
18 defendant MIKE SOLOMON was on the board of directors of the Rockridge  
19 Manor Condominium complex and resided in the complex located at 2005  
20 Pleasant Valley Avenue, Oakland, California.

21 13. At all times relevant to this lawsuit, plaintiffs are informed and believe that  
22 defendant MURRAY SINGER was on the board of directors of the Rockridge  
23 Manor Condominium complex and resided in said complex located at 2005  
24 Pleasant Valley Avenue, Oakland, California.

25 **FIRST CAUSE OF ACTION**  
26 Intentional Infliction of Emotional Distress  
27 Against All Defendants

28 14. On or about September 14, 2000, defendant EVA AMMANN contacted  
the Department of Social Services and knowingly and falsely reported that

1 plaintiff ERIC SUN was acting dangerously and possessed a gun.

2 15. Defendants' conduct as alleged here was intentional and malicious and  
3 done for the purpose of causing Plaintiffs to suffer humiliation, mental anguish,  
4 and emotional and physical distress. Defendants CHARLES BLAKENEY, MIKE  
5 SOLOMON, MURRAY SINGER, and the ROCKRIDGE MANOR HOA's conduct  
6 in confirming and ratifying the wrongful conduct was done with a wanton and  
7 reckless disregard of the consequences to Plaintiffs.

8 16. As the proximate result of the aforementioned acts, Plaintiffs suffered  
9 humiliation, mental anguish, embarrassment, shame, and emotional and physical  
10 distress, and have been injured in mind and body, all to Plaintiffs's damage.

11 17. As a result of Defendants's conduct as alleged herein, Plaintiffs suffered  
12 severe emotional distress according to proof at trial including but not limited to  
13 humiliation, embarrassment, anguish, pain, and betrayal.

14 18. As more fully alleged above, in committing all of the foregoing acts of  
15 misconduct, Defendants acted in a flagrant, aggravated, and wanton and  
16 reckless disregard of the duties and obligations they owed to Plaintiffs and their  
17 rights, and Plaintiffs are therefore entitled to and demand punitive damages.

18 19. As more fully alleged above, pursuant to California Civil Code section  
19 3345, Plaintiffs are entitled to have penalties, fines, and damages awarded  
20 increased in an amount up to three times greater than would otherwise be  
21 awarded.

22 **SECOND CAUSE OF ACTION**  
23 Negligence Against All Defendants

24 20. Plaintiffs incorporate herein by reference each and every allegation as set  
25 forth in Paragraphs 1 through 18 above.

26 21. Defendants named herein knew that Plaintiff ERIC SUN had emotional  
27 problems and that calling the Department of Social Services and/or the police  
28 would greatly harm his state of mind. Additionally, Defendants knew that calling

1 the police and/or the Department of Social Services would cause great emotional  
2 harm to Plaintiff CHRISTINE CHANG. Despite this knowledge, Defendants and  
3 each of them called and/or ratified the calling of the Department of Social  
4 Services and/or the police and fraudulently reported that Plaintiff ERIC SUN  
5 possessed a gun and was acting violently. Defendants breached their duty to  
6 Plaintiffs by fraudulently, knowingly, and falsely informing or ratifying the  
7 informing of the Department of Social Services and/or the police that Plaintiff  
8 ERIC SUN possessed a gun and was violent.

9 22. The result of Defendants's negligence as alleged herein, caused the  
10 Plaintiffs loss of security, humiliation, frustration, mental anguish, and emotional  
11 and physical distress.

12 **THIRD CAUSE OF ACTION**  
13 Slander Against All Defendants

14 23. Plaintiffs incorporate herein by reference each and every allegation as set  
15 forth in Paragraphs 1 through 21 above.

16 24. On or about September 14, 2000, defendant EVA AMMANN contacted  
17 the Department of Social Services and knowingly and falsely reported that  
18 plaintiff ERIC SUN was acting dangerously and possessed a gun.

19 25. Defendant EVA AMMANN's statements were made with wanton disregard  
20 for the truth and accused Plaintiff ERIC SUN of possessing a firearm.  
21 Defendants CHARLES BLAKENEY, MIKE SOLOMON, MURRAY SINGER, and  
22 the ROCKRIDGE MANOR HOA's conduct in confirming and ratifying the  
23 wrongful conduct was done with a wanton and reckless disregard of the  
24 consequences to Plaintiffs Therefore, Plaintiff ERIC SUN is entitled to and  
25 demands punitive damages against all Defendants.

26 26. The result of Defendants's slander as alleged herein, caused Plaintiff  
27 ERIC SUN loss of security, humiliation, frustration, mental anguish, and  
28

~~emotional and physical distress.~~

## **FOURTH CAUSE OF ACTION**

27. Plaintiffs incorporate herein by reference each and every allegation as set forth in Paragraphs 1 through 28 above.

28. Defendants actions caused the Department of Social Services and the police to intrude into the life of Plaintiff ERIC SUN in a highly offensive manner.

29. Defendants knew that falsely informing the Department of Social Services and/or the police would cause the police and Department of Social Services personnel to intrude into Plaintiff ERIC SUN's privacy by entering his condominium.

WHEREFORE, Plaintiffs pray judgment as hereinafter set forth.

## **ON THE FIRST AND THIRD AND FOURTH CAUSES OF ACTION:**

1. For general damages according to proof at the time of trial;
2. For costs of suit herein incurred;
3. For punitive damages; and
4. For such other and further relief as the Court deems just and proper.

## **ON THE SECOND CAUSE OF ACTION:**

1. For general damages according to proof at the time of trial;
2. For costs of suit herein incurred; and
3. For such other and further relief as the Court deems just and proper.

Dated: October 1, 2001

Law Office of Brett S. Allen

Brett S. Allen  
Attorney for Plaintiffs  
CHRISTINE CHANG and  
ERIC SUN

exhibit C

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4 Attorney for Plaintiffs  
Christine Chang and  
5 Eric Sun

ENDORSED  
FILED  
ALAMEDA COUNTY

APR 03 2002

6 CLERK OF THE SUPERIOR COURT  
7 By R.C. Hughes,

8 SUPERIOR COURT OF CALIFORNIA  
9 COUNTY OF ALAMEDA  
10 UNLIMITED JURISDICTION

11  
12 CHRISTINE CHANG and ERIC SUN

CASE NO.: 2002-046048

13 Plaintiffs,

14 vs.

15 CANDACE CELAYA, and DOES 1-30,  
inclusive

16 Defendants.

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17  
18 COMPLAINT FOR INTENTIONAL  
19 INFILCTION OF EMOTIONAL  
DISTRESS, ASSAULT AND BATTERY

20  
21

22 Plaintiffs, CHRISTINE CHANG and ERIC SUN complain of Defendants and each  
23 of them as follows:

24 GENERAL ALLEGATIONS

25 1. At all times relevant to this lawsuit, Plaintiffs, CHRISTINE CHANG and  
ERIC SUN, ("Plaintiffs") were residents of Alameda County, California.

26 2. Plaintiffs are informed and believe that at all times relevant to this lawsuit  
defendant CANDACE CELAYA was and is a natural person residing in Alameda  
County.

27 3. Defendants Does 1 through 30, inclusive, are sued herein under fictitious  
names because their true names and capacities, whether individual, associate,

1 corporate or governmental, are not now known to Plaintiffs. Plaintiffs are  
2 informed and believe and upon such information and belief allege that each of  
3 the Defendants named as a Doe is negligently or otherwise legally responsible in  
4 some manner for the events herein alleged, and that said Defendants negligently  
5 acted or omitted to act in one or more of their occupations and businesses and  
6 that such negligence or fault proximately caused the injuries and damages  
7 hereinafter set forth. Plaintiffs pray leave to insert the true names and capacities  
8 of said Defendants when the same are ascertained.

9 4. At all times herein mentioned, each and every one of the Defendants  
10 herein was the agent, servant and employee of each other, and each was acting  
11 within the course and scope of such agency, service and employment.

12 5. At all times relevant to this lawsuit plaintiffs CHRISTINE CHANG and  
13 ERIC SUN resided in unit number 314 located in the Rockridge Manor  
14 Condominium complex at 2005 Pleasant Valley Avenue, Oakland, California.

15 6. At all times relevant to this lawsuit, plaintiffs are informed and believe that  
16 defendant CANDACE CELAYA resided in the Rockridge Manor Condominium  
17 complex located at 2005 Pleasant Valley Avenue, Oakland, California.

18 **FIRST CAUSE OF ACTION**  
19 (Intentional Infliction of Emotional Distress)

20 7. On or about December 10, 2001, Defendant CELAYA, verbally threatened  
21 plaintiffs with bodily injury.

22 8. Defendant's conduct as alleged here was intentional and malicious and  
23 done for the purpose of causing Plaintiffs to suffer humiliation, mental anguish,  
24 and emotional and physical distress.

25 9. As the proximate result of the aforementioned acts, Plaintiffs suffered  
26 humiliation, mental anguish, embarrassment, shame, and emotional and physical  
27 distress, and have been injured in mind and body, all to Plaintiffs's damage.

28 10. As a result of Defendant's conduct as alleged herein, Plaintiffs suffered

1 severe emotional distress according to proof at trial including but not limited to  
2 humiliation, embarrassment, anguish, pain, and betrayal.

3 **SECOND CAUSE OF ACTION**  
4 (Assault)

5 11. Plaintiffs incorporate herein by reference each and every allegation as set  
6 forth in Paragraphs 1 through 10 above.

7 12. On or about December 10, 2001, in the laundry room located of the  
8 Rockridge Manor Condominium complex located at 2005 Pleasant Valley  
9 Avenue, Oakland, California, defendant CELAYA, approached plaintiffs in a  
10 menacing manor, with closed fists, and stated her intention of striking plaintiffs  
11 with her hands.

12 13. In doing the acts as alleged above, defendant CELAYA intended to place  
13 plaintiffs in apprehension of great bodily harm.

14 14. As a result of defendant CELAYA's acts as alleged above, plaintiffs, in  
15 fact, were placed in great apprehension of great bodily harm.

16 **THIRD CAUSE OF ACTION**  
17 (Battery)

18 15. Plaintiffs incorporate herein by reference each and every allegation as set  
19 forth in Paragraphs 1 through 14 above.

20 16. Immediately thereafter, defendant CELAYA pushed plaintiff CHANG in the  
21 chest and grabbed CHANG'S neck with her hands. Defendant CELAYA then  
22 repeatedly struck CHANG in the face with her fists. CHANG was able to back  
23 away but defendant CELAYA once again grabbed CHANG'S neck and  
24 threatened to kill her. CELAYA continued the attack by pushing CHANG against  
25 the wall. Plaintiff SUN heard the noise and entered the laundry room. CELAYA  
26 pushed and hit SUN in the shoulders, neck, and arm. She also scratched SUN  
27 causing his finger to bleed.

28 17. In doing the acts as alleged above, defendant CELAYA acted with the

intent to make physical contact with both plaintiffs.

## **SECOND AND THIRD CAUSES OF ACTION (Continued)**

18. At no time did plaintiffs consent to any of the acts of defendant alleged in the second and third causes of action, above.

19. As a proximate result of the acts of defendant as alleged in the second and third causes of action, plaintiff CHANG suffered bruises to her neck and face.

20. As a proximate result of the acts of defendant as alleged in the second and third causes of action, plaintiff SUN suffered bruises to his shoulders and a cut to his finger.

21. As a proximate result of the acts of defendant as alleged in the second and third causes of action, plaintiffs were hurt and injured in their health, strength, and activity, sustaining injuries to their persons, all of which have caused, and continue to cause, plaintiffs great mental and nervous pain and suffering. As a result of these injuries, plaintiffs have suffered general damages in an amount to be determined at trial.

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27 | III

28 | //

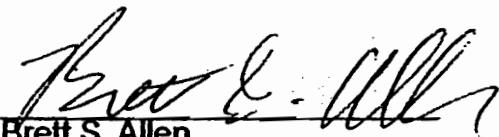
1 22. The aforementioned conduct of defendant was willful and malicious and  
2 was intended to oppress and cause injury to plaintiffs. Plaintiffs are therefore  
3 entitled to an award of punitive damages.

4 WHEREFORE, Plaintiffs pray judgment as hereinafter set forth.

5 1. For general damages according to proof at the time of trial;  
6 2. For costs of suit herein incurred;  
7 3. For punitive damages; and  
8 4. For such other and further relief as the Court deems just and  
9 proper.

10 Dated: April 1, 2002

Law Office of Brett S. Allen

11   
12 Brett S. Allen  
13 Attorney for Plaintiffs  
14 CHRISTINE CHANG and  
ERIC SUN